

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: **EHSAN ULLAH KHAN**, aka : **Chapter: 13**
Ehsan Khan, aka Ehsan U. Khan, and : Case No.: **19-10715-pmm**
MISBAH EHSAN KHAN, aka :
Misbah Khan, aka Misbah E. Khan, :
Debtors :
:

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN**, by and through their attorneys, FISHER CHRISTMAN, and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.

2. Admitted.

3. Denied. Debtors have paid \$9,664 to date. Debtor is employed in the hospitality industry in New York City and paid by event and hourly. COVID-19 has entirely eliminated Debtor's income. Nonetheless, Debtors anticipate curing the current Plan payment Default by utilizing proceeds of the personal injury settlement approved by this Court on March 16, 2020. The funds will not be available to Debtors until approximately April 10, 2020.

WHEREFORE, Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN** respectfully prays this Honorable Court for an Order than the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

By: /s/ J. Zac Christman
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